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### DRAWINGS

Please cancel original Figs. 1, 3, 5 and 7 and enter new Figs. 1, 3, 5 and 7 as set forth in the Replacement Sheets at Exhibit A.

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### REMARKS

Applicant respectfully requests reconsideration of the application identified above. Claims 6 and 7 have been amended and claims 8-11 are new. The rejections as conceivably applied to the pending claims are traversed.

#### I. Priority Claim

The specification has been amended to update the priority information as requested.

#### II. Drawings

The examiner objected to the drawings and requested a descriptive legend for each of the structural elements (denoted by reference numerals) in Figs. 1, 3, 5 and 7. The drawings have been amended as requested; and it is respectfully submitted that they are now in acceptable form. No new matter has been entered in the drawings.

#### III. Claim Objections

Claim 7 was objected to because of its improper dependency on claim 49. Claim 7 has been amended to depend properly from independent claim 6.

#### IV. Claim Rejections Based on 35 U.S.C. §112, Second Paragraph

As previously presented, claims 6 and 7 were rejected under 35 U.S.C. §112, Second Paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter. There is now sufficient antecedent basis for the limitation "digital audio data" and "caption data" recited in independent claim 6. Further, claim 6 no longer recites the phrase "when selecting a play mode" on which the previous rejection was based.

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Accordingly, it is respectfully submitted that all of the §112. Second Paragraph rejections are overcome, and that the claims are allowable.

V. Rejections Based on 35 U.S.C. §103(a)

As previously presented, claims 6 and 7 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent 5,833,468 to Guy in view of 5,900,908 to Kirkland.

Guy is directed to a system for transmitting the audio and visual data of an instructor's presentation *in real time* to multiple students at PCs, while enabling those students to ask questions on a "chalk board" by typing in text on a keyboard or tablet. Specifically, the Guy television tuner/vertical blinking interval DPI modem 208 receives the television signal from an antenna 102. The television signal received at the tuner card/DPI modem 208 is provided through the online operating module 212 as presentation data and display data—the presentation being real-time audio-video data recorded by the instructor; the display data being data that defines information input from the user of a PC 106 using input devices such as a mouse, a pen writing tablet, or keyboard. Col. 3, Lns. 18-35.

Kirkland is directed to a system that provides an audio description of non-spoken aspects of a television broadcast (for example, a description of background scenery or non-verbal character action) for visually impaired people.

Applicants respectfully submit that even if hypothetically combined, Guy and Kirkland fail to disclose, teach or suggest multiple limitations of the pending claims. First, Guy, which is relied upon for an alleged teaching of a DSP/CPU, fails to disclose, teach or suggest: (a) a DSP/CPU that operates two modes—both a reception mode and a language learning mode,

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(b) a reception mode in which the DSP/CPU processes the digital audio data and the display caption data and stores the same in memory; or (c) a language learning mode in which the DSP/CPU (i) reads the caption language learning data from the memory, (ii) controls the CODEC to convert and output the digital audio data, and (iii) controls the display to display the display caption data.

In contrast, the Guy online operating module 212 operates in a single, constant transmission mode to render a real time presentation of the presentation data and display data. Col. 4, Lns. 46-60. In this single mode, presentation data (e.g., video, audio and camera data collected from a lecturer) is transmitted to a digital presentation integrator simultaneously with display data (i.e., questions from a student to an instructor *vice versa*) to the display/presentation integrator. For example, as shown in Fig. 3, the Guy display presentation integrator integrates both the display and the presentation data (which is in the form of typed text only) and integrates that data into a single output television signal which is inserted in the television signal's vertical blinking intervals. Col. 4, Lns. 6-21. There simply is no component of Guy that acts in both a reception mode *and* a language learning mode—let alone, a DSP/CPU that controls both a CODEC to convert and output digital audio data, as well as a display to display caption data. And again, the instructor presentation of Guy is rendered *in real time*—there is no reason to have both a reception mode *to store* language learning data and a separate language learning mode, where the caption language learning data is presented to a user. Kirkland fails to make up for the deficiencies of Guy noted above.

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Second, Guy, which is relied upon for an alleged teaching of storing data to a memory, fails to disclose, teach or suggest: (a) a memory for storing the caption language learning data having audio data and caption data” (claim 6) or (b) the step of processing with the DSP/CPU the received signals and storing the caption learning data into a memory if the operation mode is the reception mode (claim 11). Indeed, Guy simply mentions that a “housing 500 may hold, for example, the main processor, a hard disk drive, a floppy disk drive, fast access volatile memory and CD ROM drive.” Col. 3, Lns. 44-46. In no way does Guy even suggest that any of this memory is designed to store the caption learning data having audio data and caption data, let alone that the DSP/CPU processes such data and stores it in the memory in certain modes—or even appreciate that the CPU can operate in different modes. Kirkland fails to make up for the deficiencies of Guy noted above.

Finally, Applicant submits that there is no motivation for combining Guy and Kirkland. Applicant is unaware how Kirkland and Guy would be compatible with one another because Guy includes a single system that is dedicated to a single lesson—to combine the Guy system with the Kirkland closed captioning system would simply make the presentation system of Guy incoherent. For example, the Kirkland audio caption data and display section of Guy would simultaneously compete for the same vertical blinking intervals. The two systems are, in the Applicant’s opinion, incompatible.

Claims 7-9 and 11 depend from amended independent claim 6 and new claim 10, respectively, and therefore patentable for at least the reasons set forth above in connection with those claims.

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It is respectfully submitted that all amended and new claims are patentable; and that the rejections under 35 U.S.C. §103(a) is improper and/or unfounded and should be withdrawn.

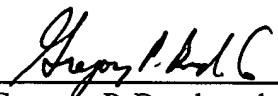
#### CONCLUSION

In view of the above amendments and these Remarks, Applicant respectfully submits that the present application is in condition for allowance. A notice to that effect is earnestly and respectfully requested.

Respectfully submitted,

KIM CHEOL

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